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16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ERICK CONTRERAS, as an individual  
19 and on behalf of all others similarly  
20 situated,

21 Plaintiff,  
22 v.

23 WORLDWIDE FLIGHT SERVICES,  
24 INC., a Delaware corporation; and DOES  
1 through 100,

25 Defendants.

26 Case No.: 2:18-cv-06036-PSG-SS

27 Assigned to: Hon. Judge Philip S.  
Gutierrez

28 **PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: April 6, 2020

Time: 1:30 p.m.

Courtroom: 6A

Action Filed: May 4, 2018

Pre-Trial Conf: April 6, 2020

Trial: April 21, 2020

1 NOTICE IS HEREBY GIVEN that on April 6, 2020, at 1:30 p.m. or as soon  
2 thereafter as the matter may be heard in Courtroom 6A of the United States District  
3 Court for the Central District of California, located at 350 West 1<sup>st</sup> Street, Los Angeles,  
4 California 90012, before the Honorable Judge Philip S. Gutierrez, Plaintiff Erick  
5 Contreras, as an individual and on behalf of all others similarly situated, will and hereby  
6 does move this Court for entry of an Order pursuant to Fed. R. Civ. Proc. 23(e) granting:

7 1. Finally certifying the proposed Settlement Classes under Rule 23(e) of the  
8 Federal Rules of Civil Procedure defined as:

9 a. *Non-Bautista* Class Members: All current and former non-exempt  
10 employees who worked in California for Defendant Worldwide  
11 Flight Services, Inc. from December 1, 2016 through July 25, 2019  
12 and who were not class members in *Guillermo Bautista v.*  
13 *Worldwide Flight Services, Inc.*, Los Angeles Superior Court Case  
No. BC622372; and

14 b. *Bautista* Class Members: All current and former non-exempt  
15 employees who worked in California for Defendant Worldwide  
16 Flight Services, Inc. from April 2, 2017 through July 25, 2019 and  
17 who were class members in *Guillermo Bautista v. Worldwide Flight*  
18 *Services, Inc.*, Los Angeles Superior Court Case No. BC622372.

- 19 2. Granting final approval to the class action settlement based upon the terms  
20 set forth in the Stipulation of Settlement (“Settlement”) as fair, reasonable  
21 and adequate under Rule 23(e) of the Federal Rules of Civil Procedure;
- 22 3. Confirming Plaintiff Erick Contreras’s appointment as Class Representative  
23 for settlement purposes;
- 24 4. Confirming the appointment of Scott M. Lidman, Elizabeth Nguyen, and  
25 Milan Moore of Lidman Law, APC and Paul K. Haines of Haines Law Group,  
APC, as Class Counsel for settlement purposes;
- 26 5. Entering final judgment in the form of the [Proposed] Order Granting  
27 Plaintiff’s Motion for Final Approval of Class Action Settlement and Final  
28 Judgment filed concurrently herewith.

This Motion is based on this Notice of Motion, the attached Memorandum of Points and Authorities, the declarations of Scott M. Lidman, Elizabeth Nguyen, Paul K. Haines, Milan Moore, Erick Contreras, and Alan Garrido of CPT Group, Inc. and the exhibits attached thereto, the pleadings and other papers filed in this action, and on any further oral or documentary evidence or argument presented at the time of hearing.

Dated: March 6, 2020

Respectfully submitted,  
Lidman Law, APC

By: /s/ Elizabeth Nguyen  
Elizabeth Nguyen  
Attorney for Plaintiff  
ERICK CONTRERAS